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ABSTRACT

Data from a national study of Title I of the Elementary and Secondary Education Act were used to investigate existing patterns of services for students eligible for Title I and other categorical programs, district policies regarding the eligibility of handicapped and limited-English-proficient students for Title I services, and coordination of services among Title I, special education, and English as a second language (ESL)/bilingual education. This report focuses on two subgroups of the Title I population: students eligible for Title I and ESL/bilingual services and students eligible for Title I and special education. Among findings of this study are that 10.9 percent of districts responding include ESL in their Title I programs, while only 3.6 percent offer special education as part of Title I. In 44 percent of the districts, all handicapped students in Title I schools who meet cutoff criteria are eligible for Title I, whereas nonhandicapped students meeting these criteria are eligible in about 25 percent of districts. All limited-English-proficient students are considered eligible for Title I if they meet cutoff criteria in 67 percent of districts, while 5 percent of districts consider all limited-English-proficient students ineligible. Most respondents indicate that coordination among categorical programs at the district level is limited. (MJL)

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TITLE I SERVICES TO STUDENTS ELIGIBLE FOR ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS

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U.S. DEPARTMENT OF EDUCATION
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A SPECIAL REPORT
FROM THE
TITLE I DISTRICT PRACTICES STUDY

TITLE I SERVICES TO STUDENTS ELIGIBLE FOR ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS

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TABLE OF CONTENTS

	Page
LIST OF TABLES	v
LIST OF FIGURES	vii
PREFACE	ix
SUMMARY	xiii
INTRODUCTION	1
LEGISLATIVE BACKGROUND	4
PRIOR RESEARCH	8
FINDINGS OF TITLE I DISTRICT PRACTICES STUDY	11
Patterns of Service for Multiply-Eligible Students	11
Eligibility of Handicapped and Limited-English-Proficient Students for Title I Services	17
Coordination among Programs	29
SUMMARY AND IMPLICATIONS	32
BIBLIOGRAPHY	36

LIST OF TABLES

		Page
TABLE 1:	USUAL DISTRICT POLICY OR PRACTICE ON DETERMINING TITLE I ELIGIBILITY FOR HANDICAPPED AND LEP STUDENTS	18
TABLE 2:	CHANGES IN DISTRICT POLICIES OR PRACTICES ON PROVIDING TITLE I SERVICES TO HANDICAPPED AND LEP STUDENTS OVER THE LAST THREE YEARS	28

LIST OF FIGURES

		Page
FIGURE 1:	OVERLAPPING TARGET GROUPS FOR THREE FEDERALLY SPONSORED EDUCATION PROGRAMS	2

PREFACE

The Title I District Practices Study was conducted by Advanced Technology, Inc. for the U.S. Department of Education's Planning and Evaluation Service. One goal of this study was to describe how local districts operated projects funded by Title I of the Elementary and Secondary Education Act [ESEA] in the 1981-82 school year. A second, related goal was to document local educators' rationales for their program decisions, their perception of the problems and benefits of requirements contained in the 1978 Title I Amendments, and their assessments of the expected effects of Chapter 1 of the Education Consolidation and Improvement Act [ECIA] on school district operations of Title I projects. The study was designed specifically to draw cross-time comparisons with the findings of the Compensatory Education Study conducted by the National Institute of Education [NIE] and to provide baseline data for subsequent analyses of Chapter 1, ECIA's administration.

The results of the Title I District Practices Study are presented in this and eight other special reports (see back cover), plus the study's Summary Report. These reports synthesize data collected from a mail questionnaire sent to Title I Directors in more than 2,000 randomly selected school districts, structured interviews and document reviews in 100 nationally representative Title I districts, and indepth case studies in 40 specially selected Title I districts.

To meet the objectives of this major national study, a special study staff was assembled within Advanced Technology's Social Sciences Division. That staff, housed in the Division's Program Evaluation Operations Center, oversaw the study design, data collection and processing, analysis work, and report preparation. The study benefited from unusually experienced data collectors who, with Advanced Technology's senior staff and consultants, conducted the structured interviews and case studies. Two consultants, Brenda Turnbull of Policy Studies Associates and Joan Michie, assisted in major aspects of the study including the writing of special reports and chapters in the Summary Report. Michael Gaffney and Daniel Schember from the law firm of Gaffney, Anspach, Schember, Klimaski & Marks, P.C., applied their longstanding familiarity with Title I's legal and policy issues to each phase of the study.

The Government Project Officers for the study, Janice Anderson and Eugene Tucker, provided substantive guidance for the completion of the tasks resulting in these final reports. The suggestions of the study's Advisory Panel and critiques provided by individuals from the Title I program office, especially William Lobosco and Thomas Enderlein, are also reflected in these reports.

Members of Advanced Technology's analytic, management, and production staff who contributed to the completion of this and other reports are too numerous to list, as are the state and local officials who cooperated with this study. Without our

mentioning their names, they should know their contributions have been recognized and truly appreciated.

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Title I District Practices Study

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TITLE I SERVICES TO STUDENTS ELIGIBLE FOR ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS

SUMMARY

In the past two decades three of the largest Federal categorical programs in education were enacted. While Title I of the Elementary and Secondary Education Act [ESEA] of 1965, Title VII of ESEA (Bilingual Education Act), and P.L. 94-142, Education for All Handicapped Children Act of 1975, were designed to be separate entities, each with different criteria for eligibility for service, some students are eligible for services from more than one of these programs.

When a district has more than one of them, complex decisions of student selection, delivery of services, and program coordination must be made with consideration for the distinct Federal, state, and local regulations, policies, and practices that operate.

This special report focuses on two subgroups of the Title I population: (1) students eligible for Title I and English-as-a-Second-Language [ESL]/bilingual services and (2) students eligible for Title I and special education.

The Title I District Practices Study gathered data from a large nationally representative sample of districts. Approximately 2,000 districts were surveyed through a mail questionnaire, and an additional 100 districts were visited by interview teams. Case studies were conducted at 40 other districts chosen

in part because they had multiple categorical programs. These data were used to investigate the following questions:

- What patterns of services exist for students eligible for Title I and other categorical programs (i.e., ESL/bilingual and special education)?
- What are district policies or practices regarding the eligibility of handicapped and limited-English-proficient [LEP] students for Title I services?
- What is done to coordinate services among Title I, special education, and ESL/bilingual education?

Service Patterns

The District Practices Study shows that 10.9 percent of the districts include ESL in their Title I programs, whereas only a very small number of districts (3.6 percent) report offering special education as part of their Title I programs.

Most districts report no change over the last three years with regard to Title I services to either handicapped (77 percent) or LEP students (82 percent). Evidence from the site visits suggests that the Title I guidelines are at least partly responsible for both the increase and decrease in Title I services to multiply-eligible students in those districts reporting a change.

The Eligibility of Handicapped Students for Title I

About one-fourth of the districts responding to the mail questionnaire say that no handicapped students in Title I schools who meet the cut-off criteria are eligible. Approximately one-third of the respondents describe a variety of conditions under which a handicapped student could or could not recieve Title I.

The eligibility of handicapped students for Title I is frequently related to the type of handicap. Students who are speech impaired, physically handicapped, visually handicapped, or hearing impaired tend to be eligible for Title I. In 44 percent of the districts, all handicapped students in Title I schools who meet the cut-off criteria are eligible for Title I.

The Eligibility of Limited-English-Proficient Students for Title I

Only 16 percent of the districts surveyed have a significant number of students of limited-English-proficiency. Five percent of the districts responding to the mail questionnaire designate LEPs as ineligible for Title I, compared to 67 percent of the districts that consider all limited or non-English-speaking students in Title I schools eligible for Title I if they meet the cut-off criteria. An additional 15 percent say the LEP students could, receive Title I services, particularly, if they could benefit from the program. During the site visits, we learned that both Title I Directors and teachers consider the ability to benefit from the program to be based most frequently on the degree of English proficiency of a student. Fourteen percent of the districts report that only LEPs are eligible for Title I, that is, the Title I program is designed specifically for LEPs. Additionally, in a few districts visited, LEPs are automatically placed in the Title I program. When these responses are compared to similiar ones which focus on handicapped students, it appears that LEPs are more readily included in Title I programs than are handicapped students.

Coordination

Most respondents indicate that coordination between categorical programs at the district level is limited. Some districts view these programs as separate entities with the results that program personnel are generally not familiar with the other programs. Other districts view coordination as a way to solve problems rather than enhance services. Districts with that viewpoint tend not to coordinate if they are experiencing few or no problems. Some coordination occurs at the building level, such as the use of the multidisciplinary team, originally developed to handle special education referrals, a method expanded to address referrals to all special programs within a school building.

Coordination efforts center more on the student selection process than on the coordination of the instructional program. For example, some Special Education Directors mention that in their districts the practice is to try Title I first before recommending a student to special education. In addition, some tend to use Title I as a transition for students coming from a self-contained environment into the mainstream, but an equal number do not. Similarly, a few ESL/Bilingual Directors report using Title I as a transition from the bilingual classroom to the regular monolingual English-speaking classrooms, while an equal number state that Title I is not a transition program for LEPs.

TITLE I SERVICES TO STUDENTS ELIGIBLE FOR ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS

INTRODUCTION

Three of the largest Federal categorical programs in education are: Title I of the Elementary and Secondary Education Act [ESEA]* of 1965; Title VII of ESEA (Bilingual Education Act);** and P.L. 94-142, Education for All Handicapped Children Act of 1975. At the Federal level, these programs were designed to be separate entities with their own requirements for program design and methods of identifying students. However, some students are eligible for services from more than one of these programs.

This special report focuses on two subgroups of the Title I population: (1) students eligible for Title I and special education and (2) students eligible for Title I and English-as-a-Second-Language [ESL] or bilingual services. These two subgroups are indicated by the shaded parts of Figure 1.***

The boundaries of these special populations are not as clearly defined as the diagram may suggest. Sometimes it is difficult to identify mildly handicapped students or those who

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*Hereafter referred to as Title I, or ESEA.

**Hereafter referred to as Title VII.

***A third subgroup of the Title I population, students eligible for all three programs, represented by the lined overlap area, are not included in this report. For a discussion of general Title I student selection procedures represented by the unshaded Title I area, see Michael Gaffney and Daniel Schember, "Current Title I School and Student Selection Procedures and Implications for Implementing Chapter 1, ECIA," a special report in this series.

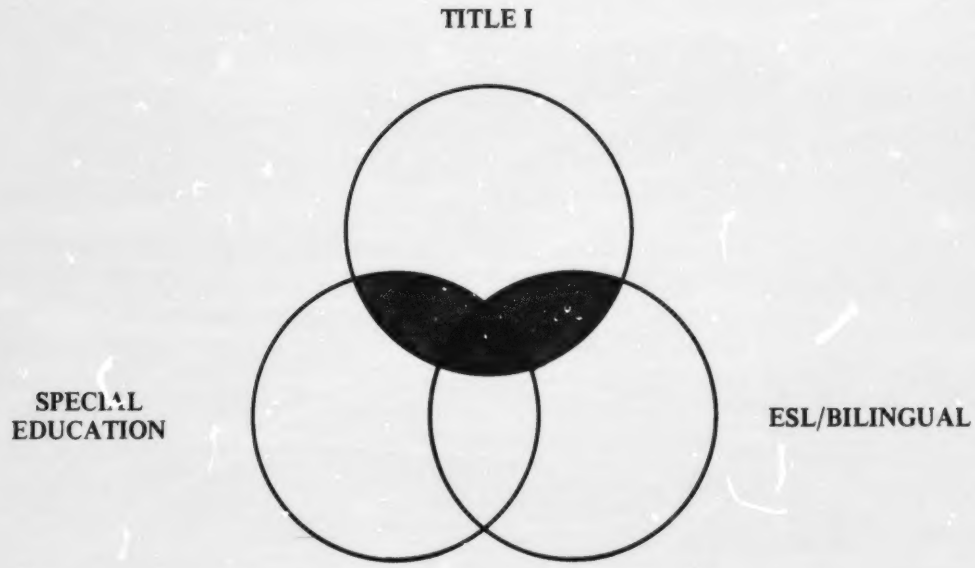

FIGURE 1

OVERLAPPING TARGET GROUPS FOR
THREE FEDERALLY SPONSORED
EDUCATION PROGRAMS

are somewhat less than proficient in English. Furthermore, distinguishing between these special populations is often difficult. For example, Title I was designed to provide services to low-achieving students in low-income areas. Underachievement, however, is also a factor in diagnosing some handicapping conditions, in particular, learning disabilities and mental retardation (Gajar, 1977). Thus, the amount of overlap of these two populations is difficult to determine.

The delivery of services to these special populations is complicated by the differing requirements for program design. Districts are required to provide special supplemental services to all students determined to be handicapped or limited-English-proficient [LEP], regardless of the schools they attend. In comparison, actual participants in the Title I program are selected from among the eligible students who attend schools designated to provide Title I services. Since Title I services are provided in only certain targeted schools, the overlap of Title I with special education or ESL/bilingual services can only occur in Title I schools.

Title I (§124(f)(1)), Title VII (§731(g)), and P.L. 94-142 (§612(6)) contain provisions which encourage coordination in districts or schools having more than one of them. These provisions do not, however, specify the nature or process of this cooperative effort. Previous research showed some of the difficulties that may ensue from operating more than one of these programs in a district or school (Kimbrough and Hill, 1981).

But these findings were based on small samples of case studies not necessarily representative of practices nationwide. By contrast, in the Title I District Practices Study,* a large, nationally representative sample of districts was used to investigate the following questions:

- What patterns of services exist for students eligible for Title I and other categorical programs (i.e., special education and ESL/bilingual)?
- What are district policies or practices regarding the eligibility of handicapped and limited-English-proficient students for Title I services?
- What is done to coordinate services among Title I, special education, and ESL/bilingual education?

LEGISLATIVE BACKGROUND

ESEA represented a major expansion of the Federal role in education. As part of ESEA, Title I provided Federal money for services to low-achieving students in low-income areas.

The 1965 Title I regulations specify that "educationally deprived children" included handicapped children, but many school districts were reluctant to start special education programs under this authority (Wirtz, 1977). This continued hesitancy to provide appropriate services to handicapped students led to the passage of several laws relating to the education of handicapped students which culminated in 1975 with P.L. 94-142. This law expands mandates and authorizations for services to the handicapped and contains a new funding formula.

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*Hereafter referred to as the District Practices Study or DPS.

P.L. 94-142 was passed two years after §504 of the Rehabilitation Act of 1973, an unfunded civil rights law which prohibits recipients of Federal funds from discriminating against an otherwise qualified handicapped person. P.L. 94-142 was a grant program designed, in part, to assist state educational agencies [SEAs] and local educational agencies [LEAs] in paying for the extra cost of providing mandated equal opportunities for the handicapped (Silverstein, 1981).

Several federally sponsored education programs are also targeted to non-English-speaking and LEP students. While Title VII is the best known source of funding for bilingual programs for LEPs, other federally sponsored education programs have provided additional educational services to these students: for example, the Emergency School Aid Act, the Indian Education Act of 1972 (P.L. 92-318), and the Migrant Education Act (P.L. 90-247). In addition, the educational rights of these students are protected by Federal legislation and several court decisions.

Title VII of ESEA, known as the Bilingual Education Act, was passed in 1968 as a Federal response to the special needs of children of limited-English-proficiency. This legislation, however, does not support a philosophy of entitlement for all LEP students to receive bilingual education. Rather, it funds demonstration projects upon competitive application to enable school districts to plan, develop, and implement local bilingual projects. These projects were intended to be demonstrations and

provide for state and local capacity-building--not permanently funded Federal projects.

The right to equal educational opportunities for LEPs is guaranteed under §601 of Title VI of the Civil Rights Act of 1964 which states:

> No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

In 1974 the Supreme Court based its decision in Lau v. Nichols on Title VI of the Civil Rights Act of 1964 and subsequent regulations and guidelines of the Office of Civil Rights [OCR]. The Lau decision interpreted this clause to extend the concept of discrimination to include failure of school systems to provide instruction which will allow effective participation in classroom activities of limited or non-English-speaking students.

In 1975, OCR issued a document entitled "Task Force Findings Specifying Remedies Available for Eliminating Past Educational Practices Ruled Unlawful under Lau v. Nichols," which recommended some form of bilingual education as the appropriate remedy at almost every level of public schooling. The major characteristic of the programs suggested in the "Lau Remedies" is the use of languages other than English to teach subject matter. While the "Lau Remedies" mandate that bilingual education be provided to LEP students in most types of school situations, the legal status of this mandate was uncertain. Thus, OCR in 1976 issued a

statement to its regional offices that the "Task Force Findings" were "guidelines" only (Rotberg, 1982).

Title I, P.L. 94-142, and Title VII all contain provisions which encourage coordination with other programs. The issue of how to coordinate these programs became a topic of major concern to educational policymakers during the writing of the regulations for the 1978 Amendments to Title I (P.L. 95-561). Attention centered on the Title I supplement-not-supplant provisions designed to ensure that Title I funds are used in addition to, not in place of, state and local funds. Compliance with supplement-not-supplant is demonstrated by the required-by-law standard by which Title I funds cannot be used to pay for services a school district is required to make available under (1) Federal, state, or local law; (2) a court order; or (3) a voluntary plan for compliance approved by the Office of Civil Rights in the Department of Education [ED].

There was concern that LEAs would use Title I funds to meet obligations under P.L. 94-142 and §504, in violation of the required-by-law standard. One interpretation of this standard was that all special services to handicapped students had to be provided under P.L. 94-142 and §504. However, the effect of this practice would be the automatic exclusion of all handicapped students from Title I, which is a violation of §504.

The coordination of Title I with other special programs (including special education, ESL/bilingual, and state compensatory education programs) is addressed in a section in the final

Title I regulations of January 19, 1981. This section was changed to the status of a guideline on March 27, 1981. Two basic principles are reaffirmed in the guidelines:

> Title I funds are not to be used in meeting the obligation of districts to provide a free appropriate public education to handicapped students or in providing effective participation of LEPs in school programs. These services must be met with state and local funds as required by law (Title VI and §504).
>
> LEPs and the handicapped cannot automatically be excluded from Title I programs when these services could be of benefit to them. Therefore, once state and local funds are used to meet required minimums, Title I may be used in a supplemental fashion.

For local administrators, the difficulty in implementing these guidelines centers around the question, "What is the required minimum for providing a free and appropriate education to handicapped students or in providing effective participation of LEPs in school programs?"

PRIOR RESEARCH

In 1979 Birman studied the overlap between Title I and P.L. 94-142, specifically focusing on issues relating to the methods of targeting students and matching students to program services. These case studies reveal that the receipt of services by dually identified students varied greatly at the state, district, and individual school levels. A number of staff were confused about whether or not students were allowed to receive both Title I and special education services. Duplication of services was rare because school staff members were reluctant to give some students

two similar programs while other students with special needs received no extra services. In most districts studied by Birman, there was sequential coordination of Title I and special education services. That is, Title I was used as first recourse prior to referral to special education and as a means of support for handicapped students being mainstreamed into the regular classroom.

Michie (1981) focused on the receipt of services by dually eligible students in several school districts within one state and found a similar pattern of sequential coordination. Some staff members were under the impression that students could not legally receive both Title I and special education services; a few suggested that some students should not be given two similar programs while other students with needs received no additional services. In two of the five districts studied by Michie, coordination of all special services within a school building was done by a multidisciplinary team, originally established to review special education referrals. However, in these two districts, students were generally unable to receive Title I and special education concurrently because of district policy, although sequential coordination of service was employed. Thus, overly restrictive policies on the provision of Title I to handicapped students hampered efforts to use the multidisciplinary team as a coordination mechanism to its fullest extent.

In the winter of 1978-79 the National Center for Educational Statistics [NCES] conducted a fast response survey to determine

the extent to which districts experienced problems related to providing services to students eligible for several Federal programs including Title I, Title VII, and P.L. 94-142. One of the most frequently reported problems was the difficulty in coordinating instructional requirements for students.

A more recent study, Kimbrough and Hill (1981), investigated the effects of multiple program implementation on school and district operations. This study used a sample of eight school districts, all of which had four or more categorical programs. These districts were chosen, among other reasons, because they were having difficulties administering mutiple categorical programs. Kimbrough and Hill's analysis focused on the concepts of interference (i.e., the conflict between categorical programs and the core local program) and cross-subsidy (i.e., the use of categorical funds intended for one beneficiary group to provide services to another beneficiary group). While most of the interference findings have more to do with the core-base program and categorical programs, Kimbrough and Hill did report that categorical programs often segregate students for large portions of the day.

Kimbrough and Hill also reported that funds for one categorical program are often used to provide services required of another program (cross-subsidy). One type of cross-subsidy identified is district adjustment of Title I eligibility criteria to ensure that services for learning disabled children were purchased by Title I whenever possible. Some districts changed

the services offered by a funded program to fulfill the requirements of an unfunded or partially funded program. This often resulted in a reduction of services to children not eligible for other categorical programs. Finally, Kimbrough and Hill found that districts diverted administrative and teaching staff from one program to fulfill the requirements of another program. Specific examples include a Title VII teacher supervising Title I aides who worked in bilingual programs and Title I teachers working under the supervision of a special education coordinator to supplement the special education program.

In contrast to the small, purposely selected sample of districts in the Kimbrough and Hill study, the Title I District Practices Study surveyed, through a mail questionnaire, a nationally representative sample of approximately 2,000 school districts, not selected on the basis of known difficulties with multiple categorical programs. Furthermore, interview teams visited a representative sample of 100 districts, and case studies were conducted at 40 additional districts chosen in part because they had multiple categorical programs.*

FINDINGS OF TITLE I DISTRICT PRACTICES STUDY

Patterns of Services for Multiply-Eligible Students

In the National Institute of Education [NIE] study of Title I (1977), 10.2 percent of districts surveyed offered ESL as part

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*For a complete description of the District Practices Study methodology, see Chapter 2 of the study's Summary Report.

of their Title I programs, and 7.8 percent offered special education. In the District Practices Study, 10.9 percent include ESL as part of their Title I program, and 3.6 percent of the Title I districts report special education as part of the Title I program. A comparison of results from these two major studies indicates that the percentage of districts having special education as part of their Title I program has decreased but there has been little change in the percentage of districts providing ESL in Title I.

PERCENTAGE OF DISTRICTS OFFERING INSTRUCTIONAL SERVICES FUNDED WHOLLY OR IN PART BY TITLE I

	NIE (1977)	DISTRICT PRACTICES STUDY (1982)
English-as-a-Second Language	10.2%	10.9%
Special Education	7.8%	3.6%

It is probable that the implementation of P.L. 94-142 with its requirement of provision of special education services is the major contributing factor for the decrease in special education services funded by Title I.*

During the analysis phase of the DPS, more information was desired about the kind of special education services being provided by Title I funds. Four percent of the districts visited reported that special education for the handicapped is a

*Although P.L. 94-142 was passed in 1975, districts were not required to implement it until the 1977-78 school year. Final Federal regulations were published on August 23, 1977, after the collection of the NIE data.

part of their Title I programs. This percentage closely parallels the 3.6 percent reported from the mail questionnaire sample. Follow-up phone calls were made to all the districts visited which reported having this subject area in Title I. In all of these districts the Title I Directors say that handicapped students are eligible for Title I, but there is no Title I component designed specifically for them. Thus, the actual percentage of districts having a Title I component designed for the handicapped is probably much smaller than the obtained 3.6 percent.

Most services designed specifically for the handicapped are provided through sources other than Title I. Generally, some combination of Federal, state, and local funding is employed. Part or all of the special education services may be provided through special education cooperatives.

A variety of program designs and patterns of service delivery provide ESL and bilingual education to LEP students.* These program designs vary among LEAs as well as within a single district. It is not unusual for a district with a significant LEP population to operate several bilingual programs, each funded separately, perhaps serving different languages, schools, and grade levels. Bilingual education programs are generally funded

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*ESL classes are provided to help students acquire proficiency in English. They do not use the mother tongue as a vehicle of instruction. Bilingual education classes use both English and the mother tongue in teaching subject matter. ESL is typically a component in bilingual programs.

by Title VII or by state and local funds, not by Title I. Title I may provide a Title I aide's services to a bilingual education program or ESL classes independent of the bilingual program.

Among possible configurations, ESL services may be:

1. Funded solely by Title I as a component of the Title I program
2. Funded partially by Title I and provided as part of the bilingual education program only to bilingual program participants--e.g., Title I aide
3. Funded totally by the bilingual education program for bilingual program participants

Usually a student receives just 1, or 2, or 3, both 1 and 2, or both 1 and 3.

Districts with enough LEP students to generate a bilingual education program tend to design the bilingual program as self-contained and Title I as a pullout program. During case study visits, several LEAs report using Title I teachers to provide ESL services, while one LEA uses Title I teachers to provide ESL only for those students about to be transitioned to a monolingual English class from the bilingual program. In contrast, other Bilingual Directors interviewed indicate little or no knowledge of the Title I program. Their district philosophy tends to view the categorical programs as separate, and these Directors do not know the number of LEP students or bilingual program students receiving Title I services.

Since LEPs' low achievement in academic subjects is due, in part, to their limited proficiency in English, it is not

surprising that one-half of the Title I instructors concentrate their efforts on vocabulary development when providing Title I services to LEP students, and 20.6 percent report specifically coordinating their efforts with district ESL programs. In contrast, 17.6 percent say that LEPs receive the same Title I instruction as students proficient in English.

Independence of Categorical Program Designs

Seventy-five percent of the ESL/Bilingual Directors interviewed say that Title I funds play no role in deciding grade levels, subject, or program design in their programs. While one district with a significant LEP population reports an attempt to take bilingual needs of the Title I program into account in the allocation of resources, there is no district formula for allocating teachers and materials. In another district, decisions for the ESL program are influenced by what Title I would provide.

Sixty-eight percent of the Special Education Directors interviewed report that grade levels, subjects, and program design for special education are not affected by the availability of Title I. In contrast, only two percent of the districts have planned division of labor for the two programs. In one of these, reading decoding skills are provided in Title I, whereas special education focuses on language arts and mathematics. In the other district, Title I is used as the reading component in the special education program. Twenty-seven percent of the Special Education Directors suggest that Title I reduces the number of referrals to special education and/or the number of

students included in special education. The following quotations are illustrative:

- There was an increase in special education referrals after the sixth grade, when Title I ended.
- When Title I was added to the junior high, there was a decrease in requests for special education money at this level.
- Title I provides enough remedial service to keep some students out of the LD program.

This reduction in the number of referrals and/or students served in special education as the result of the availability of Title I is closely related to student selection matters. The main effect on the special education program is to reduce the numbers of students requiring special education or evaluation services; that is, the size, but not necessarily the content, of the program is affected. These examples support but do not confirm Kimbrough and Hill's hypothesis of cross-subsidy.

Most ESL/Bilingual and Special Education Directors say the existence or absence of Title I does not influence whether or not a school receives other categorical programs. However, other data from our special purpose sample are not always consistent with these responses. For example, in one LEA the presence of the ESL program in certain schools results in their becoming Title I schools. In that district, LEPs are bused to LEP centers in non-Title I schools, thus raising the free-lunch count and making those schools eligible for Title I. In another district, special Federal programs are planned to be independent of one another so that Title I does not provide math in high school because it is provided by another program.

Eligibility of Handicapped and Limited-English-Proficient Students for Title I Services

More data were obtained on student selection for handicapped students than on LEP students for two reasons. First, more districts operate a special education program than operate an ESL/bilingual program. Second, the identification and appropriate placement of handicapped students are more complex than are the procedures for LEP students, and more questions were asked to obtain the necessary detail.

Handicapped Students

Although most services designed specifically for handicapped students are provided outside of Title I, a number of handicapped students are also eligible for Title I.* According to the Title I guidelines, such students cannot be automatically excluded from Title I programs if these students could benefit from Title I services. In the mail questionnaire, district administrators were asked to describe their usual policy or practice for including handicapped students in the Title I program. Approximately one-third of the respondents describe a variety of conditions under which a handicapped student could or could not receive Title I. About one-fourth report that no handicapped students are eligible for Title I programs, while 44 percent report that all handicapped students in Title I schools who meet the cut-off criteria are eligible for Title I programs (Table 1).

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*Any student determined to be handicapped must receive special education services. In comparison, for Title I programs, actual participants are selected from among eligible children.

TABLE 1

USUAL DISTRICT POLICY OR PRACTICE ON DETERMINING TITLE I ELIGIBILITY FOR HANDICAPPED AND LEP STUDENTS

HANDICAPPED N=415 DISTRICTS	LEP N=72 DISTRICTS*
44% All handicapped students in Title I schools who meet the cut-off criteria are eligible for Title I	67% All limited or non-English-speaking students in Title I schools are eligible for Title I if they meet the cut-off criteria
32% Students are eligible depending on certain conditions	15% Students are eligible depending on certain conditions
	14% Title I serves only LEPs
24% No handicapped students are eligible for Title I	5% No limited or non-English-speaking students are eligible for Title I
100% Total	101%** Total

*This small N results from the relatively small proportion of districts nationwide which enroll a substantial number of LEP students.

**Rounding error.

Data from our site visits suggest at least two possible explanations for the reported exclusion of handicapped students from the Title I program in some districts:

- LEAs may be automatically excluding handicapped students, in which case these LEAs are in violation of §504 of the Rehabilitation Act of 1973 (civil rights legislation for the handicapped) and of Title I guidelines. Automatic exclusion was reported during several site visits.

- Title I Directors may not be aware of who is legally defined as handicapped. During our site visit interviews some Title I Directors who had initially responded that no handicapped student is eligible for Title I were questioned as to whether or not this included the speech impaired. Some qualified their response by saying that only the speech impaired could be included in Title I. One Director asked, "Are the speech impaired considered handicapped?" Similarly, in several LEAs, school personnel stated that special education students are generally excluded from Title I but they later added that physically handicapped students are eligible on the same basis as the nonhandicapped.

Some respondents indicate that decisions about the inclusion of handicapped children in Title I are made on a case-by-case basis. These decisions are frequently made during multidisciplinary team meetings, described more fully in a subsequent section of this report. Some districts use a variety of criteria to determine whether a handicapped student can also receive Title I, for example:

- If the student can benefit from Title I
- If the student can be reasonably expected to make substantial progress
- If the student is able to function in small groups

- If the student is mainstreamed (that is, students in self-contained special education classrooms are excluded)
- If the student is receiving special education in one subject area, the student may not receive Title I instruction in the same subject but may receive Title I instruction in another subject area. (For example, if a student's special education program consists solely of reading instruction, the student could not also receive Title I reading but is eligible for Title I math.)

In some districts eligibility of handicapped students for Title I is related to the type of handicap. Students who are speech impaired, physically handicapped, visually handicapped, and hearing impaired tend to be eligible for Title I. Educable mentally retarded [EMR] students tend to be excluded. One of the most difficult decisions for local administrators providing Title I services to handicapped students is whether learning disabled [LD] students should be included in the Title I program. One Title I Director says, "LD is the major thorn in our side as far as cross-programming." Nevertheless, more districts deem LD students eligible than ineligible for Title I.

It is probable that a major reason for the difficulty in establishing a policy about the inclusion of LD students in Title I is the problem of defining learning disabilities. As recently as 1981, representatives of six organizations which constitute the National Joint Committee for Learning Disabilities developed a new definition for LD (Hammill, Leigh, McNutt, and Larsen, 1981). Although the definition of learning disabilities has received the most attention during the past several years, the

difficulty of identifying other handicapping conditions is also a problem. According to Kakalik (1979):

> Nearly all definitions of handicapped children (including the Federal definitions) are nonspecific in the sense that they permit a great deal of latitude on the part of local educational agencies and personnel in whom [sic] they actually decide are handicapped children. Because the interpretations of definitions are not necessarily comparable across jurisdictions, an individual child may be considered "handicapped" if he or she lives in one location, but "normal" if he or she lives elsewhere. Or, the child may be categorized as having one type of handicap in one location and another type in another location, even if both locations have the same set of possible categories of handicapping conditions. (Especially nebulous terms in common use include "learning disabled," "educational handicapped," and "emotionally disturbed.") (p. 199)

Although the development of definitions and criteria for handicapping conditions is a responsibility of special educators, the decisions made impinge on Title I student selection processes. For example, in one LEA visited, the Special Education Program Office was in the process of "tightening" its definition of EMR to conform to the American Association on Mental Deficiency [AAMD] definition. This change will exclude the slow learners from the EMR program. The Director of Special Education in that district says the slow learners should be served in Title I.

Special Education Directors were asked how difficult student selection decisions were made. Answers include (1) intensified testing, (2) letting parents pick the program they prefer,

(3) making the decision during a staffing team meeting, and (4) basing the decision on space available in the program.

In two districts visited, attitudes toward minorities influence placement decisions for Title I and special education. One district was cited by the SEA because Title I is primarily minority, and special education is primarily white. In another district, a black Principal acts as a gatekeeper for special education referrals because he fears that too many blacks could be referred and consequently stigmatized. This Principal considers Title I to be part of the regular program and therefore a preferred service for black students who need extra help.

Sometimes districts do not have specific policies excluding the handicapped from Title I services but, in effect, few, if any, handicapped students receive Title I services. For example, the policy of several districts is to include handicapped students in Title I if there is space; in practice, there is no space. One district's policy states that if handicapped students meet the Title I criteria and can succeed in Title I without reshaping the program, they should be served. In practice, only the speech impaired receive Title I in that district.

Scheduling is a factor in determining whether a handicapped student should be included in Title I. A number of school administrators and teachers express concern about pulling students out of the regular classroom for an extended period of time and fragmenting the instructional program. One LEA's policy is that students cannot be pulled out for special programs for more than

20 percent of the total class time. Two other LEAs report that if students are not receiving more than five to six hours of special education, they can receive Title I. In one district, LD students do not receive Title I services because students are pulled out of regular class for both services during the same period.

Limited-English-Proficient Students

Only 16 percent of the districts surveyed have a significant number of students of limited-English-proficiency. In the mail questionnaire, district administrators were asked to describe their usual policy or practice for including LEP students in Title I. Five percent of the districts designate LEPs as not eligible for Title I compared to 67 percent of the districts that consider all limited or non-English-speaking students in Title I schools eligible for Title I if they meet the cut-off criteria. Sometimes a district has no formal policy to exclude LEPs from Title I, but in practice they are excluded. For example, since one district does not administer tests in English to LEPs in the first and second grades, required achievement test scores used to select students for the Title I program are not available. Another district emphasizes that they do not exclude LEPs from Title I while arbitrarily deciding that no LEP can benefit from Title I. In a third district, LEPs do not participate in Title I since ESL classes are scheduled concurrently with Title I classes.

Fourteen percent of the districts responding to the mail questionniare report that only LEPs are eligible for Title I, that is, the Title I program is designed specifically for LEPs. Additionally, in a few districts visited, LEPs are automatically placed in the Title I program. When these responses are compared to similar ones focusing on the handicapped, it appears that LEPs are more likely to be included in Title I programs than are handicapped students (Table 1, p. 18).

An additional 15 percent of districts report that LEP students may participate in the Title I program under certain conditions, that is, if they can benefit from it. Both Title I Directors and teachers consider that the capacity to benefit from the program is usually based on the degree of the student's English. In other districts an LEP student may receive Title I:

- If the student has sufficient English to participate in the program
- If the student is fluent enough to read in English
- If the student is not served by any other program
- If the Title I program can provide materials designed for LEP students
- If the Title I program can provide bilingual instructors

Both administrators and teachers were asked to give their preference regarding the district policy or practice of including or excluding LEP students in the Title I program. Eighty-nine percent of the Title I Directors for whom the question was relevant feel that the policy or practice operating in their districts is a good one. Most who are happy with their policy

indicate that they include LEPs in Title I. Eight percent of the Directors do not favor their district policy, and a small percent indicate that they have ambivalent feelings. When the four Title I Directors who do not favor their district policy or practice were asked to suggest changes, two Directors stated that LEPs should not be served in Title I; one Director suggested combining the Title I and bilingual programs so LEPs could be served without being pulled out for too many programs; and one Director said it was a problem in his district having only an English-monolingual staff and suggested that Title I teachers become aware of the culture of LEP students.

Ninety-two percent of the Principals for whom the question was relevant think their district policies or practices for serving LEPs in Title I are good ones. Thus, it appears that for Principals, the district policy or practice regarding LEP students is not a major problem.

Almost three-fourths of the regular classroom teachers interviewed feel that the LEP students should receive Title I services, while 18 percent have no preference. Some teachers say that LEP students need the extra help Title I could provide, especially in the areas of oral language, vocabulary, and reading. Others feel that LEPs should receive Title I under certain conditions, for example, if no other special programs for LEPs are available, or if the Title I instructors are bilingual.

Almost one-half of all Title I instructors think LEPs should be in the Title I program, but 9 percent feel LEPs belong in a

separate program. Almost 10 percent of the instructors say if the Title I program could provide ESL/bilingual teachers or special materials, then the LEPs should get Title I. A similar percentage say if the LEPs speak English adequately they should receive Title I services. A few Title I instructors feel they do not have the expertise to teach LEP students, and one instructor says including them in the Title I program would hurt the program's evaluation results. Eighteen percent indicate no preference.

More of the regular teachers interviewed (73 percent) prefer to include LEPs in Title I than do the Title I instructors interviewed (44 percent). One plausible reason for this difference is that some regular teachers may view the Title I program as a means of getting extra services for the LEP students, especially if Title I offers an ESL component. Other regular teachers may view the Title I program as a "dumping ground" for LEP students. The Title I instructors, on the other hand, who tend to be monolingual, may be more hesitant to serve LEPs because they may lack necessary training and experience in teaching LEP students.

Changes in District Policies or Practices

The District Practices Study examined whether or not the Title I guidelines on the provision of services to multiply-eligible students produced changes in district policies or practices over the last three years. The majority of districts indicate no change over this period with regard to Title I services to either handicapped (77 percent) or LEP students (82

percent). Of the 23 percent reporting some change in services to handicapped students, 38 percent of the districts say they have just begun to serve the handicapped; 15 percent have increased services; and 44 percent have decreased such services (Table 2). Eighteen percent of the districts report some change in providing Title I services to LEP students. Almost one-half (46 percent) of these report they started serving LEPs over the last three years; 19 percent increased services, while 31 percent decreased such services.

Evidence from the site visits suggests that the Title I guidelines were at least partly responsible for both the increase and decrease in Title I services to multiply-eligible students. Some districts which formerly excluded LEPs and handicapped students from Title I began serving such students when it was learned they were eligible for Title I services under certain conditions. In contrast, a few districts that provided all available services to multiply-eligible students decreased Title I services to LEPs and handicapped students because the guidelines clarified that not all of these students had to be served. Districts may report a decrease in services to the special groups within Title I because of (1) a general reduction in the Title I budget and (2) reductions being absorbed by decreasing services to LEP and handicapped students in Title I as other monies became available for them.

TABLE 2

CHANGES IN DISTRICT POLICIES OR PRACTICES ON PROVIDING TITLE I SERVICES TO HANDICAPPED AND LEP STUDENTS OVER THE LAST THREE YEARS

HANDICAPPED N=341 districts	LEP N=92 districts*
77% No change	82% No change
23% Some change in practice	18% Some change in practice
Of Those Districts with a Change in Practice:	Of Those Districts with a Change in Practice:
N=75	N=16
38% Title I has just begun to serve handicapped students within the last three years.	46% Title I has just begun to serve students of limited-English-proficiency within the last three years.
15% Title I has served handicapped students for at least three years, but the services have increased.	19% Title I has just begun to serve students of limited-English-proficiency within the last three years, but the services have increased.
44% Title I has served handicapped students for at least three years, but the services have decreased.	31% Title I has served LEPs for at least three years, but the services have decreased.
5% Other	4% Other
102%** Total	100% Total

*A significant number of LEAs consider this question nonapplicable.

**Rounding error.

Coordination among Programs

Federal education laws were created in response to particular educational needs and political pressures rather than in a coordinated attempt to serve students with special needs (Berke and Demarest, 1978; Birman, 1979; and Kirp and Winslow, 1978).

Prior research done by Birman (1979) and Michie (1981) found some sequential coordination of Title I and special education services. In these cases, Title I was used as first recourse prior to referral to special education. It was also used as a means of support for handicapped students being mainstreamed into the regular classroom.

Some Special Education Directors interviewed for the DPS mention that their districts' practices are to try Title I first before recommending a student to special education. In addition, some use Title I as a transition for students coming from a self-contained environment into the mainstream, but an equal number do not use Title I as a mainstreaming device. Similarly, a few ESL/Bilingual Directors mention that they use Title I as a transition from the bilingual classroom to the regular monolingual English-speaking classroom, while an equal number state that Title I is not a transition program for LEPs.

However, sequential coordination, a process for selecting students into programs, represents only the first step in program coordination. It does not address the problem of coordinating instructional requirements for students, identified in the NCES survey (1978-79) of difficulties related to serving multiply-eligible students.

In most LEAs, students considered to be potential candidates for special education are referred to a school-based multidisciplinary team, variously known as Child Study Team; Diagnostic Prescriptive Team; Admission, Review, and Dismissal [ARD] Committee; Screening Review Committee; and Student Support Team. Case study data from 45 percent of the 20 districts chosen in part because of their multiple categorical programs reveal that Title I teachers may be on the multidisciplinary team and are sometimes permanent members. In some LEAs this committee is expanded to handle all referrals, not just those for special education. In some LEAs all other services must be tried before referral to special education; Title I is among the services considered. Referrals from the multidisciplinary team to Title I generally involve only a few students each year; the vast majority of Title I students are selected according to a separate Title I selection procedure.

Discussions of these teams did not occur during interviews regarding services to LEP students. Perhaps since ESL/bilingual programs are not mandated to form child review teams such as those for special education, no vehicle is in place to promote this kind of coordination.

Expansion of these multidisciplinary teams could be an effective management practice worth disseminating. It could be quickly implemented by an LEA already possessing such a special team. Title I instructors often noted the benefits of serving on such a team for improving coordination of instruction.

Multidisciplinary teams generally operate at the school building level. At the district level, the concept of coordination is not seen as a way to enhance program delivery. Rather, districts view "coordination" as something developed to solve a problem. An example of this is a fairly common response given by respondents explaining the lack of program coordination: "We don't coordinate because we have no problems."

The majority of respondents indicate that coordination between categorical programs is limited. Where district philosophy is to view the programs as separate entities, program personnel are generally not familiar with the other programs. When coordination takes place, it is mostly between teachers on an informal basis or during joint in-services for Title I and other categorical program staffs. A few LEAs cite coordination discussions during monthly meetings of district-level administrators as an example of formal coordination. Some specific examples of coordination include: Title I and special education teachers both served on a committee to preview supplementary materials; categorical teachers who served the same students coordinating with each other so as not to duplicate services; bilingual education staff being asked to review Title I components for applicability to LEP students; teachers sharing materials; and bilingual and Title I programs trying to coordinate parent council activities such as the joint use of parent volunteers in the bilingual and Title I programs.

Analysis of data from interviews with Title I instructors on topics of coordination indicates a trend of Title I instructors and special education teachers to discuss student problems and progress. In contrast, Title I and ESL/bilingual teachers most often discuss materials, teaching techniques, and teacher in-services. This distinction might be expected, given the characteristics of the students under consideration. Many of the special education students, especially those labeled as learning disabled or emotionally disturbed, often exhibit behavioral and attentional difficulties such as hyperactivity along with educational problems. In contrast, the LEP students have difficulty communicating in English. To address this problem, district emphasis often centers on identification and acquisition of materials written in languages other than English and on methodology used in a bilingual setting rather than diagnostic and prescriptive discussions of LEP students.

Another example of an effective management practice is the use of substitute teachers so the regular and Title I teachers can meet to coordinate activities. In the district adopting this strategy, in every grading period the district provides substitute teachers to all regular teachers having Title I students. This enables them to meet and develop a coordination plan for the following grading period.

SUMMARY AND IMPLICATIONS

This special report focuses on two subgroups of the Title I population: (1) students eligible for Title I and special

education and (2) students eligible for Title I and ESL/bilingual services.

Only 3.6 percent of the surveyed districts report that special education is a part of their Title I programs. Therefore, most services designed specificially for the handicapped are provided through sources other than Title I. In comparison, a variety of program designs are used to deliver services to LEP students. These programs may be partially or totally funded by Title I, for example, (1) a bilingual education program with a Title I aide, (2) ESL services funded solely by Title I as a component of the Title I program, and (3) a bilingual program with an ESL component, funded in part by Title I. ESL is reported to be a component of the Title I program in 10.9 percent of the surveyed districts. Other programs for LEPs are funded by Title VII or by state or local funds.

District policies or practices regarding the eligibility of handicapped students for Title I range from excluding all handicapped students from Title I (24 percent of the districts) to considering all handicapped students in Title I schools who meet the cut-off criteria to be eligible for Title I (44 percent of the districts). In the remaining districts (32 percent), handicapped students are eligible for Title I depending on certain conditions such as the type or severity of the handicap, the probability that the student could benefit from Title I, space available in the Title I program, and the number of times the student is being pulled out of the regular classroom.

LEPs are more likely to be included in Title I programs than are handicapped students. Indeed, 67 percent of the districts with a significant number of students of limited-English-proficiency consider all such students in Title I schools to be eligible for Title I if they meet the cut-off criteria, whereas only 5 percent of the districts exclude all LEPs. In 14 percent of the districts, the Title I program is designed specifically for LEPs. In 15 percent of the districts, LEPs are eligible for Title I depending on certain conditions, in particular, their ability to benefit from the program which is generally based on the degree of English proficiency of the student.

The range of district policies regarding the eligibility of LEPs and handicapped students for Title I reflects varying strategies employed to deal with a complex issue. Permitting all or none of the LEPs and handicapped students in Title I schools to be eligible for Title I if they meet the cut-off criteria may be the easiest approach to administer at the district level. But such practices could disrupt instructional programs, deny services which might benefit students, or even violate Title I's supplement-not-supplant provision. The establishment of conditional criteria for the eligibility of LEPs and handicapped students for Title I is a means of addressing the varying needs of students and defining the boundaries of the multiply-eligible population. The better examples of these conditional criteria take into consideration student needs, abilities, and disabilities, as well as the patterns of special services the students

are receiving and the related factor of scheduling. Many of these criteria represent sound educational practices which other districts might want to employ.

Coordination efforts to date have centered on student selection matters such as the referral of a student from one special program to another or the determination of the services for which the student is eligible. One formal mechanism for this coordination is the school-based multidisciplinary team, originally developed to handle special education referrals, which has been expanded to address referrals to all special programs within a school building.

However, the coordination of the student selection process represents only the first step in program coordination. The more central issue is the coordination of the instructional program of students who are receiving two or more extra programs concurrently. Multidisciplinary teams have the potential of being used to provide such coordination, but thus far there is little evidence to suggest that they are being utilized in this way. The primary mode of instructional coordination appears to be informal exchanges among individual teachers, who receive little guidance from district administrators. Thus, coordination rests on the creativity of teachers who may not be familiar with the requirements for compliance.

The coordination of the Title I program with the base program has been recognized as a necessity for providing a consistent instructional program to students. Coordination is even

more imperative when students are receiving services from several categorical programs. Yet district administrators of these programs tend to view them as separate entities which are not coordinated because the district is experiencing no problems with them. A number of administrators do not know how many students in their program are receiving services from other categorical programs, and some are unaware of the kinds of services being provided in other categorical programs. Without this information, administrators are unable to foster a coordinated service delivery system throughout the district.

District administrators are best suited for establishing coordination mechanisms because they are responsible for the allocation of resources and overall program implementation. Their greater familiarity with Federal and state requirements enables them to present compliant coordination strategies which meet local needs and avoid interference with other district programs. Since coordination is viewed as a means of solving a problem, it is possible that reduced budgets will provide the impetus for future cooperative endeavors.

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CHAPTER 1 OF THE EDUCATION CONSOLIDATION AND IMPROVEMENT ACT: A LOCAL SCHOOL DISTRICT PERSPECTIVE	*Richard Jung*
CURRENT TITLE I SCHOOL AND STUDENT SELECTION PROCEDURES AND IMPLICATIONS FOR IMPLEMENTING CHAPTER 1, ECIA	*Michael J. Gaffney and Daniel M. Schember*
THE EFFECTS OF THE TITLE I SUPPLEMENT-NOT-SUPPLANT AND EXCESS COSTS PROVISIONS ON PROGRAM DESIGN DECISIONS	*Michael J. Gaffney and Daniel M. Schember*
THE INFLUENCE OF TITLE I BUDGET CUTS ON LOCAL ALLOCATION DECISIONS: SOME PATTERNS FROM PAST AND CURRENT PRACTICES	*Richard Apling*
NONPUBLIC SCHOOL STUDENTS IN TITLE I, ESEA PROGRAMS: A QUESTION OF "EQUAL" SERVICES	*Richard Jung*
PAPERWORK AND ADMINISTRATIVE BURDEN FOR SCHOOL DISTRICTS UNDER TITLE I	*Victor Rezmovic and J. Ward Keesling*
STATE INFLUENCE ON LOCAL TITLE I PRACTICES	*Ted Bartell*
TECHNICAL ASSISTANCE AND LOCAL PROGRAM IMPLEMENTATION IN TITLE I, ESEA	*Brenda J. Turnbull*
TITLE I SERVICES TO STUDENTS ELIGIBLE FOR ESL/BILINGUAL OR SPECIAL EDUCATION PROGRAMS	*Maryann McKay and Joan Michie*